

## UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

United States of America )

v. )

JORDAN FRANCISCO QUIROGA SANCHEZ )  
BASTIAN ALEJANDRO ORELLANA MORALES, and )  
SERGIO ANDRES ORTEGA CABELLO )

Case No. 1:25-mj-81

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of DECEMBER 9, 2024 in the county of Hamilton in the  
Southern District of Ohio, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. 2314  
18 U.S.C. 1519INTERSTATE TRANSPORTATION OF STOLEN PROPERTY;  
FALSIFICATION OF RECORDS IN A FEDERAL INVESTIGATION

This criminal complaint is based on these facts:

See Affidavit

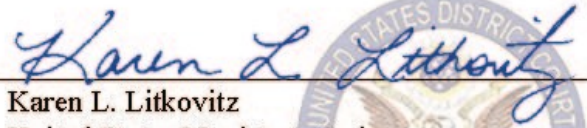
☒ Continued on the attached sheet.

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Complainant's signature

Special Agent Aaron Bauder, FBI

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Printed name and titleSworn to before me and signed in my presence.  
**via FaceTime video**Date: **Feb 3, 2025**City and state: Cincinnati, Ohio  
Karen L. Litkovitz  
United States Magistrate Judge

**AFFIDAVIT IN SUPPORT OF A  
CRIMINAL COMPLAINT AND ARREST WARRANT  
AFFIDAVIT**

I, Aaron Bauder, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a criminal complaint charging Jordan Francisco Quiroga SANCHEZ and Bastian Alejandro Orellana MORALES with one violation Title 18, United States Code, Section 2314, Interstate Transportation of Stolen Property, and Sergio Andres Ortega CABELLO with one violation of Title 18, United States Code, Section 1519, Falsification of Records in a Federal Investigation.

2. I am a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the Cincinnati, Ohio Field Office Division, and have been so employed since 2019. As a Special Agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. I am currently assigned to investigate matters involving violent crimes, gangs, robberies, criminal enterprises, narcotics, and violent crimes against children. I have participated in the preparation and execution of Federal arrest and search warrants in my position as a Special Agent. I have also been involved with the analysis of pen registers, the monitoring of Title III wire intercepts, and the installation and monitoring of tracking devices for vehicles in relation to the investigations with which I have been involved. I have also utilized confidential human sources, pen registers, toll records, physical surveillances, and electronic surveillances in the process of the investigations in which I have been involved. Further, I have been the affiant on Federal search warrants, arrest warrants, Title III wire intercepts, and have written reports during these investigations. The facts in this affidavit come from my personal observations, my training and experience, and information

obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. Through my training and experience as well as discussions with other law enforcement investigators and cooperating suspects, I have become familiar with methods utilized by South American Theft Groups to disguise their illegal activities and the manner in which they conduct these illegal activities. Furthermore, I have become familiar with the activities of South American Theft Groups.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses.

5. Since this affidavit is being submitted for the limited purpose of establishing probable cause authorizing the arrest of SANCHEZ, MORALES, and CABELLO, I have not included each and every fact and circumstance of which I am aware. I have set forth only those facts which I believe are necessary to establish such probable cause.

#### **PROBABLE CAUSE**

6. On December 9, 2024, at approximately 8:14PM, law enforcement responded to 7995 Ayers Road, Cincinnati Ohio, (RESIDENCE) in reference to a reported burglary. The residence is owned by J.B., an NFL player for the Cincinnati Bengals.

7. Upon arriving, investigators discovered that nearly \$300,000 worth of designer luggage, glasses, wrist watches, and jewelry had been stolen from the residence. J.B. was not in the residence at the time of the burglary, as he was in Dallas, Texas for an NFL game. An associate of J.B., O. P., had been dropped off at the residence shortly after 8:00PM and noticed that the living room and master bedroom looked unusually messy. She then observed that a

master bedroom window on the back side of the residence had been broken. The window was located at the southwest corner of the residence and faced a wooded area.

8. The burglary likely occurred between approximately 6:00PM and 8:14PM on December 9, 2024. Notably, J.B. was away from the residence from approximately 2:30PM on December 8, 2024, through the time of the burglary, due to playing in an NFL game in Dallas, Texas on the evening of December 9, 2024. Although J.B. was out of state at the time, a security detail had been deployed to watch the residence while he was gone. At approximately 6:00PM, a shift change occurred with the security detail. This involved a walk around the perimeter of the house, during which no windows appeared to be broken. After 6:00PM, and during the likely time of the burglary, the security detail was positioned in the driveway at the front of the residence. Due to these factors, it is believed that the burglars entered the property from the woods located to the southwest of the house, which would have been out of sight of the security detail. They then forced entry through the bedroom window at the rear of the house. No security cameras were located at the rear of the residence.

9. On December 10, 2024, law enforcement investigators returned to the scene to continue the investigation. It was discovered that a decorative topper to one of the fence posts had been knocked to the ground. Moreover, a tracking K-9 was deployed in an attempt to follow the path of the burglars. After an article search, the K-9 traveled through the back yard and moved eastbound, in the direction of Eight Mile Road. The K-9 eventually stopped tracking in the vicinity of 7980 Old Kellogg Road. The residence located at 7980 Old Kellogg Road is currently vacant and listed for sale. The property is connected directly to J.B.'s property.

10. Investigators made contact with the HOA President, who provided an image from a trail camera that was located in the vicinity of 7996 Ayers Road. The trail camera image was

dated December 9, 2024, with a time stamp of 7:18PM [approximate]. The image displayed what appeared to be a single person walking through the wooded area, carrying what appeared to be a piece of luggage.

11. On December 11, 2024, investigators discovered a vehicle of interest while utilizing “license plate readers” (LPR) in the area of the incident. On December 9, at approximately 7:28PM, an LPR camera located near 8100 Old Kellogg Road and Eight Mile Road (near the residence) captured an image of a white colored 2024 Volkswagen Atlas SUV bearing Florida license plate RDDR37 (SUBJECT VEHICLE). The SUBJECT VEHICLE was captured on an LPR located near 365 Eastern Boulevard, Jeffersonville, Indiana, at approximately 9:09PM on December 9, 2024. Further investigation indicated that the vehicle was captured on LPRs in Florida on December 8, 2024, and again in Florida on December 10, 2024.

12. On December 12, 2024, a representative from the McDonald’s located at 599 Northwest 62<sup>nd</sup> Street, Miami, Florida 33150, provided a still frame of the 2024 Volkswagen in their parking lot to investigators (photo below). The photo showed the driver of the vehicle standing in between the SUBJECT VEHICLE and another vehicle with its lights on. The camera footage was timestamped at 1:30AM EST on December 11, 2024.



13. Furthermore, investigators learned that on December 11, at approximately 10:00AM, the (SUBJECT VEHICLE) was towed from the McDonald's by a private towing company after being reported as abandoned. Investigation into the vehicle ownership is ongoing.

14. The modus operandi (M.O.) of this burglary is consistent with burglaries executed by South American Theft Groups (SATG). SATG's are known for several organized crime trends including pickpocket crimes, commercial burglaries, and residential burglaries. The SATG M.O. for residential burglaries include targeting high-end houses that back up to green spaces, walking trails, golf courses, or other undeveloped land that are used to conceal the approach of the suspects. They then gain access to the residence through a rear window or glass door, on the second floor when possible. Items targeted are predominately jewelry and designer accessories often leaving behind other valuable items. SATG's coordinate their efforts from coastal locations such as New York, California, and Florida. Typically, after the burglaries are committed, the SATG returns to one of these coastal locations to fence the items stolen. The groups usually consist of foreign nationals from South America who either enter the country

illegally or overstay on visas to continue committing their crimes. SATG's often travel using rental vehicles and will carry false identifications and documents.

15. In recent months, several agencies across the United States have shared information via email regarding these burglaries through a nationwide SATG working group that is maintained by the FBI. These agencies have had burglaries that fit the SATG M.O. wherein professional athletes were the victims. Many of these cases share similar fact patterns to the burglary described above.

16. On December 16, 2024, a Hamilton County Sheriff's detective made contact with the owner of the SUBJECT VEHICLE, Yuriy KOROTOVSKYY. KOROTOVSKYY provided a lease agreement for the SUBJECT VEHICLE, which revealed that the vehicle was rented by JULIAN ANDRES SANCHEZ MENDOZA (MENDOZA). MENDOZA was later identified by law enforcement as Sergio Andres Ortega CABELLO (CABELLO). CABELLO provided a fake photo ID to KOROTOVSKYY which is pictured below:





17. Furthermore, a photograph of CABELLO and his passenger, later identified by law enforcement to be Bastian Alejandro Orellana MORALES (MORALES), was taken by KOROTOVSKYY at the time the vehicle was rented. KOROTOVSKYY voluntarily provided the photograph to investigators which shows CABELLO and his accomplice inside of the SUBJECT VEHICLE:



18. Based on my training and experience, I believe that the SUBJECT VEHICLE mentioned in the above paragraphs was likely used by the burglars. Several local investigations have been perpetuated by similar SATG groups utilizing vehicles with Florida license plates. These vehicles are often rented in Florida, driven to Ohio to execute the criminal activity, and returned to Florida soon thereafter. This incident follows a similar fact pattern. LPRs have shown that the vehicle was near the residence around the time of the burglary. Moreover, the vehicle was located in Florida one day before and one day after the incident.

19. On December 17, 2024, United States Magistrate Judge Karen L. Litkovitz signed a search warrant for the cellular tower data surrounding the timeframe of the J.B. burglary, which



included the Cincinnati LPR Camera, the Jeffersonville, Indiana LPR camera, and the McDonald's in Miami, FL. (see Southern District of Ohio Case No. 1:24-MJ-987).

20. After receiving the records for the aforementioned search warrant detailed in the above paragraph, law enforcement learned of multiple suspected T-Mobile accounts that were identified by their IMSI's and IMEI's. One of the phone numbers was identified as 347-598-9991.

21. Based on my training and experience with SATG investigations, I know subjects involved in SATG's and organized crime will often have multiple cellular devices that are used to further their criminal acts. Additionally, I know that subjects involved in SATG's will routinely activate and de-activate cellular devices, sometimes after as little as one month, to deter and disrupt law enforcement. By "dropping" cellular telephones within the one-month time period, SATG's can continue to disrupt law enforcement efforts to identify the user's cellular telephone number, the user's identity, and the user's location data. Additionally, I know that SATG's commonly use cellular devices to perpetuate their criminal acts by communicating with one another before, during, and after their criminal acts. Furthermore, I know that SATG's will routinely take photographs, videos, send text messages, use encrypted messaging applications, and use Internet web search platforms to search their potential victims, addresses, and value to the merchandise that was stolen.

22. On January 3, 2025, U.S. Magistrate Judge Thomas Wilson out of the Middle District of Florida, signed a search warrant authorizing geographic location of 347-598-9991.

23. Location history showed that the 347-598-9991 device was in the vicinity of J.B.'s residence on December 9, 2024. Additionally, ping data revealed that the number was in the vicinity of Orlando, FL on January 7, 2025, and travelled North to the Greene County, OH

area on January 8, 2025. Investigators contacted neighboring law enforcement agencies and used license plate readers (LPRs) to locate a vehicle with a Florida plate 87BHHC, that had location history showing in Florida, Greene County, OH, and in the Columbus, OH area, which matched ping locations for the phone number 347-598-9991. Investigators were able to locate the vehicle at the La Quinta Hotel in Fairborn, OH.

24. On January 10, 2025, investigators observed four males exit the La Quinta Hotel, located at 2540 University Boulevard, Fairborn, Ohio. The males were observed carrying designer-style luggage and entered a black Chevrolet Blazer with Florida registration 87BHHC. A male on the rear driver's side, later identified as Sergio Andres Ortega CABELLO, pulled up next to a vehicle occupied by two plain clothes law enforcement officers and used a cellular device to take photographs of the vehicle before leaving La Quinta. When the vehicle left the hotel, the cell phone pings began moving in the same direction as the vehicle.

25. Investigators and Ohio State Highway Patrol (OSP) marked units conducted surveillance on the black Chevrolet Blazer. Officers observed a marked lanes violation on IR-70 and a traffic stop was initiated on IR-70 at approximately 1:49PM.

26. OSP learned that the driver, Jordan Francisco Quiroga SANCHEZ, did not have a valid driver's license and presented a likely fake identification card from Argentina with the name Valentino Gonzalez Diaz. OSP received identification cards from the other three occupants of the black Blazer. The front seat passenger presented a likely fake identification card from Venezuela with the name Juan Contreras Morales, and has been identified as Bastian Alejandro Orellana MORALES. The rear driver's side occupant presented a identification card from Argentina with the name Julian Andres Sanchez Mendoza. This individual has since been identified as Sergio Andres Ortega CABELLO. Of note, this was the same identification card

that CABELLO used to rent the 2024 Volkswagen Atlas as mentioned in the above paragraphs. The rear passenger's side occupant presented a New York State driver's license with the name Alexander Esteban Huaiquil CHAVEZ, which investigators learned was his true identification.

27. After the four subject's true identifications were learned, all four males were identified through law enforcement indices as being illegally in the country or overstayed their permissions. OSP conducted an inventory search of the black Blazer and located two Husky automatic center punch tools wrapped in a cloth towel in the area of the glove compartment. Based on my training and experience, I know that this style of tool is used by SATG's to break glass and enter houses. Also observed in the black Blazer was an old LSU shirt and Bengals hat, believed to be stolen from the December 9, 2024, burglary of J.B.'s residence in Hamilton County, Ohio.

28. All four occupants were transported to the Clark County Sheriff's Office for further investigation. An investigator called target phone number ending in 9991 and one of the two cell phones that Jordan Francisco Quiroga Sanchez possessed started ringing. Investigators previously conducted a search warrant for historical cell site data on this phone number and can place this phone in the area of the December 9, 2024, burglary in Hamilton County, Ohio and also at a McDonald's in Miami, Florida on December 11, 2024.

29. Bastian Alejandro Orellana MORALES, wearing a blue winter jacket, carrying a Louis Vuitton duffle style bag was previously identified as a male possibly involved in the burglary offense on December 9, 2024, in Hamilton County, Ohio. On December 11, 2024, MORALES was also observed by investigators on surveillance footage at a McDonald's in Miami, Florida exiting a white Volkswagen Atlas with Florida registration RDDR37 known to be in the area of the burglary on December 9, 2024.

30. Investigators recognized the green duffle style canvas and leather bag being carried by one of the males, Alexander Esteban Huaiquil CHAVEZ, as he was walking out of the La Quinta Hotel. The bag appeared similar to the bag previously seen on the McDonalds surveillance footage exiting the Volkswagen Atlas in Miami, Florida, on December 11, 2024, and entering into a black Jeep Cherokee with Florida registration 45DCBN.

31. All four occupants were interviewed at the Clark County Sheriff's Office after being read their Miranda Rights in an interview room. SANCHEZ and CABELLO advised that they were in Ohio for vacation to see the snow but shared little other information with investigators prior to requesting legal representation. CHAVEZ explained to investigators that he was just visiting Ohio with the other Chileans and that he did not know their real names. CHAVEZ admitted to purchasing a glass breaker Husky tool at Home Depot but would not give a reason why he purchased this tool.

32. Your affiant and a Hamilton County Sheriff's Detective conducted the post-Miranda Subject interview of MORALES, who provided that he was just visiting Ohio to see the snow and had never been to Ohio previously. He was shown a picture of himself and CABELLO seated in the Volkswagen Atlas shown above in paragraph 17. MORALES confirmed that he was in fact the individual seated in the passenger seat of the Atlas.

33. State investigators executed search warrants to download the six (6) cell phones and one (1) Apple Watch from these subjects and the black Blazer they were in when arrested. Forensic analysis of CABELLO's cell phone revealed photos of jewelry confirmed to be stolen from J.B.'s residence in December of 2024. The photograph below, taken on December 10, 2024, shows CABELLO, MORALES, SANCHEZ, and an individual believed to be Matias Ignacio CONTRERAS SANCHEZ:



34. Further analysis of CABELLO's phone revealed multiple photographs that had been taken of items believed to be stolen from J.B.'s residence. According to the forensic analysis conducted on the phone, many of these photographs had been deleted during the same time frame as the traffic stop with OSP on January 10, 2025.

35. For example, the photograph extracted from CABELLO's phone shows multiple items stolen from J.B.'s residence. The photograph was taken at approximately 12:37PM EST (UTC-5) on December 10, 2024, and was deleted at approximately 2:03PM EST (UTC-5) on January 10, 2025. As discussed above, the traffic stop was initiated by OSP at approximately 1:49PM on January 10, 2025.





36. Based on the forensic analysis of the phone and my training and experience, I believe that CABELLO deleted photos linking his phone to the burglary while the traffic stop was being conducted. This particular photograph was taken one day after the burglary and was deleted from his phone just minutes after the traffic stop had been initiated, likely allowing CABELLO time to delete them while as law enforcement was engaged with the traffic stop.

37. Moreover, a photograph of the rear of J.B.'s residence located at 7995 Ayers Road was extracted from CABELLO's phone, with a similar fact pattern. As pictured below, the photograph was taken at approximately 7:12PM ETC (UTC-5) on December 9, 2024, the day and approximate time of the burglary. The photo was subsequently deleted during the time of the OSP traffic stop.

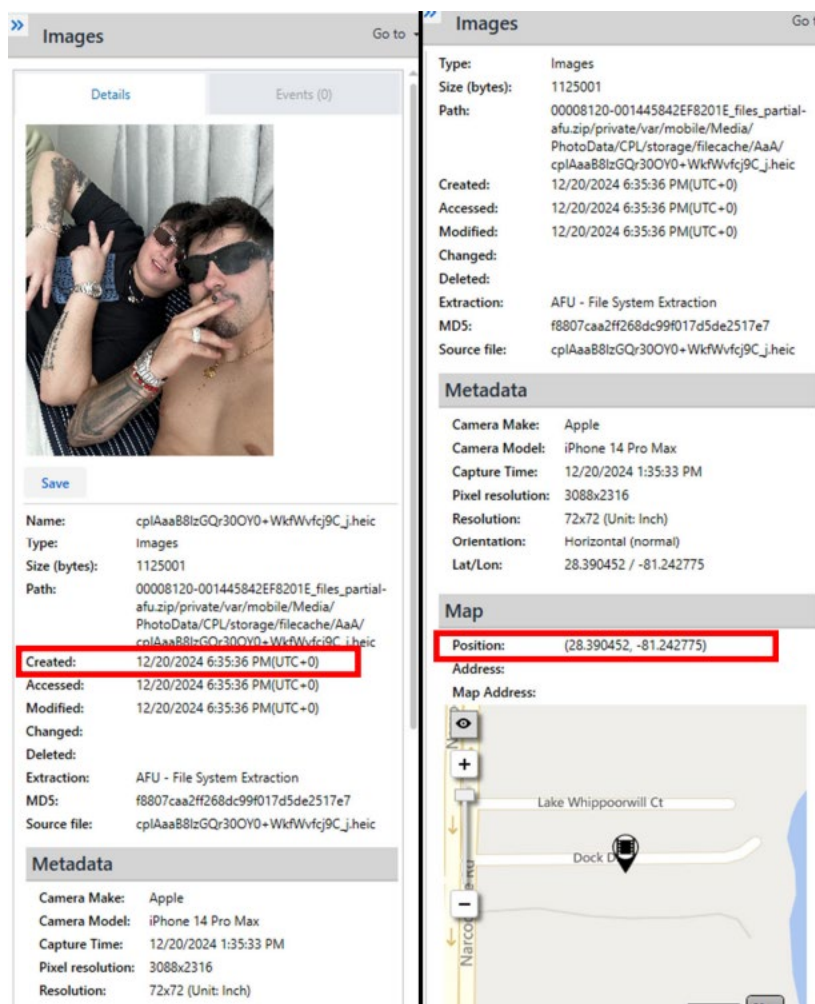


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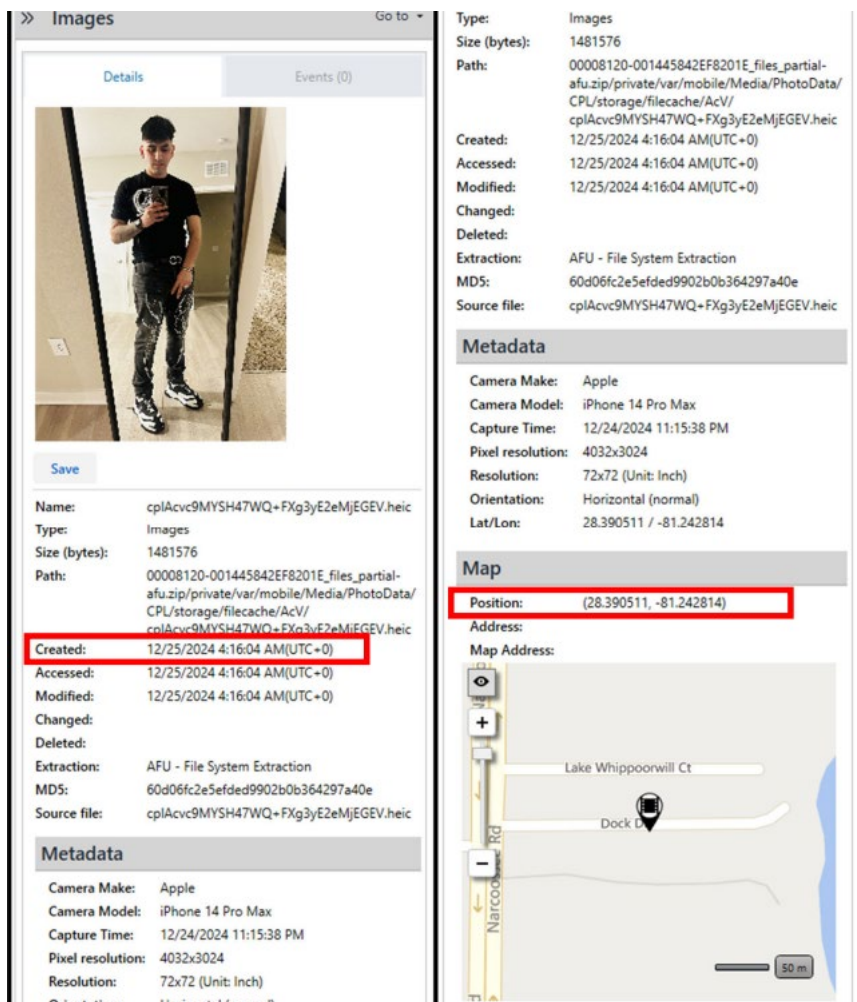
**\*Deleted during traffic stop**

38. A forensic extraction of SANCHEZ' phone ending in 9991 revealed additional photographs of SANCHEZ and MORALES wearing jewelry stolen from J.B.'s residence while in Florida, several days after the burglary. For example, the photograph below taken on December 20, 2024, shows SANCHEZ and MORALES wearing jewelry believed to be stolen from J.B.'s residence. The corresponding geo-location data associated with the photograph below indicate that the photo was taken in the vicinity of southeast Orlando, Florida.





39. An additional photo (below) from SANCHEZ's phone shows him wearing jewelry believed to have been stolen during the burglary of J.B.'s residence. The photo was taken on December 25<sup>th</sup>, 2024, and the geolocation data also corresponds to southeast Orlando, Florida.



40. Based on my training and experience, I believe that SANCHEZ, MORALES, and other members of the group traveled outside of the state of Ohio following the burglary of 7995 Ayers Road, Cincinnati, Ohio, while in possession of the stolen items. The group was still in possession of at least some of the stolen items when they returned to Florida and were in possession of at least some of the items as late as December 25, 2024.

### CONCLUSION

41. Based upon the information provided within this affidavit, I believe that probable cause has been shown that, beginning on a date unknown, but by at least in or about December 2024, and continuing through on or about January 10, 2025, Jordan Francisco Quiroga

SANCHEZ and Bastian Alejandro Orellana MORALES violated Title 18, United States Code, Section 2314, Interstate Transportation of Stolen Property by using false identification to rent a vehicle in Florida, transporting it across state lines to commit a burglary, and returning to Florida while in possession of stolen property. I also believe that probable cause has been shown that on or around January 10, 2025, Sergio Andres Ortega CABELLO violated Title 18, United States Code, Section 1519, Falsification of Records in a Federal Investigation by deleting cell phone photographs linking himself to the burglary of J.B.'s residence on or about December 9, 2024.

Respectfully submitted,



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Aaron Bauder  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me via reliable electronic means on February 3, 2025.

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Karen L. Litkovitz  
United States Magistrate Judge

